



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 30 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Timothy J. Wessel
President
Emerald Polymer Additives
1550 County Road 1450 N
Henry, Illinois 61537

Dear Mr. Wessel:

Enclosed is an executed original of the final Administrative Consent Order (ACO). The ACO requires Emerald to conduct sampling, over a 12 month period, of its incoming off-site wastewater streams, track the monthly volatile organic materials entering the wastewater treatment plant and to revise its Title V Permit.

Please direct any questions regarding this case to Padma Bending, Associate Regional Counsel at 312.353.8917.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Dickens", is written over a horizontal line.

Brian Dickens
Chief
Air Enforcement and Compliance Assurance Section (MN/OH)

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-14-113(a)-IL-06
)	
Emerald Performance Materials, LLC)	Proceeding Under Sections 113(a)(3) and
Henry, Illinois)	114(a)(1) of the Clean Air Act
)	42 U.S.C. §§ 7413(a)(3) and 7414(a)(1)
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)	
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)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to Emerald Performance Materials, LLC (Emerald) under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act (CAA or Act), 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).

Statutory and Regulatory Background

2. The CAA establishes a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. 42 U.S.C. § 7401(b)(1).
3. Section 112 of the CAA sets forth a national program for the control of Hazardous Air Pollutants (HAPs). 42 U.S.C. § 7412.
4. Congress directed EPA to publish a list of all categories and subcategories of, *inter alia*, major sources of HAPs. 42 U.S.C. § 7412(c).
5. "Major source" was and is defined as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any

HAP or 25 tons per year or more of any combination of HAPs. 42 U.S.C. § 7412(a)(1) and 40 C.F.R. § 63.2.

6. Congress directed EPA to promulgate regulations establishing emission standards for each category or subcategory of, *inter alia*, major sources of HAPs listed. 42 U.S.C. § 7412(d)(1). These emission standards must require the maximum degree of reduction in emissions of HAPs that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for the new or existing sources in the category or subcategory to which the emission standard applies. 42 U.S.C. § 7412(d)(2).
7. To the extent that it is not feasible to prescribe or enforce an emission standard for control of a HAP, Congress authorized EPA to promulgate “design, equipment, work practice, or operational” standards, which are to be treated as emission standards. 42 U.S.C. §§ 7412(d)(2) and (h)(1).
8. The emission standards promulgated under Section 112 of the 1990 Amendments to the CAA, 42 U.S.C. § 7412, are known as the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories or maximum achievable control technology (MACT) standards. These emission standards are found in Part 63 of Title 40 of the Code of Federal Regulations.
9. After the effective date of any emission standard, limitation, or regulation promulgated pursuant to Section 112 of the CAA, no person may operate a source in violation of such standard, limitation, or regulation. 42 U.S.C. § 7412(i)(3).

10. Under Section 112 of the CAA, 42 U.S.C. § 7412, the Administrator of EPA promulgated the General Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) at 40 C.F.R. Part 63, Subpart A; 40 C.F.R. § 63.1 – 63.16 on March 16, 1994. 59 Fed. Reg. 12430 (March 16, 1994) (“Subpart A”).
11. On July 1, 1996, EPA promulgated the NESHAP for Off-Site Waste and Recovery Operations, codified at 40 C.F.R. Part 63, Subpart DD. 61 *Fed. Reg.* 30 4158. (“Subpart DD”)
12. Subpart DD applies to the owner and operator of a plant site which is a major source of hazardous air pollutant (HAP) emissions as defined in 40 CFR § 63.2, and has waste management operations or recovery operations which are used on off-site materials received at the facility. 40 C.F.R. § 63.680(a).
13. One of the waste management operations which is subject to Subpart DD includes an operation that treats wastewater which is an off-site material and that is exempted from regulation as a hazardous waste treatment, storage, and disposal facility (TSD) under 40 CFR § 264.1(g)(6) or 40 CFR § 265.1(c)(10). 40 C.F.R. § 63.680(a)(2)(ii),
14. The Hazardous Waste Treatment, Storage and Disposal Facility regulations, at 40 CFR §264.1(g)(6) state the requirements of this part do not apply to: The owner or operator of an elementary neutralization unit or a wastewater treatment unit as defined in 40 CFR §260.10 of this chapter, provided that if the owner or operator is diluting hazardous ignitable (D001) wastes (other than the D001 High TOC Subcategory defined in 40 CFR §268.40 of this chapter, Table Treatment Standards for Hazardous Wastes), or reactive (D003) waste, to remove the characteristic before land disposal, the owner/operator must comply with the requirements set out in 40 CFR §264.17(b).

15. The General Provisions of the TSD regulations exempts from regulation a wastewater treatment unit which 1) is part of a wastewater treatment facility that is subject to regulation under either section 402 or 307(b) of the Clean Water Act; and 2) receives and treats or stores an influent wastewater that is a hazardous waste as defined in 40 CFR §261.3.
16. Subpart DD defines off-site material as, among other things, waste as a material generated from industrial, commercial, mining, or agricultural operations or from community activities that is discarded, discharged, or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded or discharged, which contains a HAP (listed in Table 1 of Subpart DD) at the point-of-delivery and is delivered, transferred, or otherwise moved to the plant site from a location outside the boundaries of the plant site. 40 CFR § 63.680(b)(1).
17. Subpart DD defines the point-of-delivery as the point at the boundary or within the plant site where the owner or operator first accepts custody, takes possession, or assumes responsibility for the management of an off-site material stream. Subpart DD, at 40 CFR §63.680 (d), states that the owner or operator of affected sources subject to this subpart is exempted from the requirements of 40 CFR §§63.682 through 63.699 of this subpart in situations with a total annual quantity of the HAP that is contained in the off-site material received at the plant site is less than 1 megagram per year. To qualify for this exemption, the owner must meet the following 3 requirements:
 - a. “The owner or operator must prepare an initial determination of the total annual HAP quantity in the off-site material received at the plant site. This determination

is based on the total quantity of the HAP listed in Table 1 of this subpart as determined at the point-of-delivery for each off-site material stream”;

- b. “The owner or operator must prepare new documentation whenever the extent of changes to the quantity or composition of the off-site material received at the plant site could cause the total annual HAP quantity in the off-site material received at the plant site to exceed the limit of 1 megagram per year”; and
- c. “The owner or operator must maintain documentation to support the owner’s or operator’s determination of the total annual HAP quantity in the off-site material received at the plant site. This documentation must include the basis and data used for determining the HAP content of the off-site material.”

- 18. Subpart A, at 40 CFR§ 63.9 (h), states, among other things, that when an affected source becomes subject to a relevant standard, the owner or operator of such source shall submit to the Administrator a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard.
- 19. Subpart A, at 40 CFR § 63.10 (b)(3), states, among other things, that if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after

the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source).

20. Each State must submit to the Administrator or EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. §7410.
21. On February 21, 1980, EPA approved 35 Illinois Administrative Code (IAC) Part 215.301 as part of the federally enforceable State Implementation Plan (SIP) for Illinois. 45 Fed. Reg. 11472 (February 21, 1980).
22. 35 IAC Part 215.301 states no person shall cause or allow the discharge of more than 8 pounds per hour of organic material into the atmosphere from any emission source.
23. Sections 501 through 507 of the Act, 42 U.S.C. §§ 7661 through 7661f, establish an operating permit program for major stationary sources and other sources made subject to Section 502(a) of the Act, 42 U.S.C. § 7661a(a).
24. Section 502(a) of the Act provides that after the effective date of any permit program approved or promulgated under this subchapter, "it shall be unlawful for any person to violate any requirement of a permit issued under this subchapter. . ."
25. Pursuant to Section 502(b) of the Act, 42 U.S.C. § 7661a(b), on July 21, 1992, EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. 57 Fed. Reg. 32295 (July 21, 1992). These regulations are codified at 40 C.F.R. Part 70.

26. Section 502(d)(1) of the Act, 42 U.S.C. § 7661a(d)(1), requires that each State develop and submit for EPA's approval a permit program under State law.
27. On December 4, 2001, EPA granted Illinois full approval of its Clean Air Act Permit Program. 66 Fed. Reg. 62946 (December 4, 2001). The program became effective on November 30, 2001.
28. Under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating the NESHAP regulations. The Administrator has delegated this authority to the Director of the Air and Radiation Division.
29. The Administrator of EPA may require any person who owns or operates an emission source to make reports; install, use and maintain monitoring equipment; sample emissions; and provide information required by the Administrator under Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

30. Emerald owns and operates the facility located at 1550 County Road 1450 N., Henry, Illinois 61537 (Facility).
31. Emerald is a "major source" for HAP.
32. Emerald currently operates its facility under Title V Clean Air Act Permit Program Permit No. 123803AAD issued by the Illinois Environmental Protection Agency (IL EPA) on November 24, 2003, as required by Title V of the Federal Clean Air Act of 1990.

33. Emerald operates a waste management operation at 1550 County Road 1450 N, Henry, Illinois as defined in § 63.682. A waste management operation is defined as the collection of off-site material management units, process vents, and equipment components used at a plant site to manage an off-site material stream from the point-of-delivery to the point it is discharged from the plant site.
34. Emerald treats a wastewater stream which is an off-site material as defined by § 63.680(a)(2)(ii).
35. Emerald's off-site material is a waste that is not produced or generated within the plant site, but the material is delivered, transferred, or otherwise moved to the plant site from a location outside the boundaries of the plant site. Additionally, the waste contains vinyl chloride, a HAP listed in Table 1 of Subpart DD, based on the composition of the material at the point-of-delivery (40 CFR § 63.680(b)).
36. Emerald's waste management operation is exempted from regulation as a hazardous waste treatment, storage, and disposal facility (TSDF) under 40 CFR § 264.1(g)(6) or 40 CFR § 265.1(c)(10), as required by 40 CFR § 63.680(a)(2)(ii). The waste management operation is exempt from TSDF regulations because Emerald is an owner or operator of a wastewater treatment unit as defined in 40 CFR § 260.10. A wastewater treatment unit is defined as a part of a wastewater treatment facility that is subject to regulation under either section 402 or 307(b) of the Clean Water Act; and receives and treats an influent wastewater that is a hazardous waste as defined in 40 CFR § 261.3, and; and meets the definition of tank or tank system in 40 CFR § 260.10. Emerald is regulated under section 402 of the Clean Water Act, and receives and treats influent waste water with vinyl

chloride concentrations defining it as a hazardous waste, and meets the definition of a tank system.

37. Prior to November 2011, Emerald had not formally submitted an initial determination of the total annual HAPs quantity in the off-site material received at its facility.
38. Emerald owns and operates a wastewater treatment plant at 1550 County Road 1450N, Henry, Illinois 61537.
39. Emissions from Emerald's wastewater treatment plant are subject to the applicable VOM emission limit set forth in 35 IAC 215.301 which requires that organic material emissions not exceed 8 pounds per hour or do not qualify as a photo chemically reactive material (as defined in IAC 211.4690).
40. EPA issued a Finding of Violation (FOV) to Emerald on April 8, 2008, alleging that Emerald was subject to and had violated various provisions of Subpart DD.
41. EPA and Emerald held a conference on the FOV on July 16, 2008.
42. EPA sent Emerald Requests for Information under Section 114 of the CAA, on or about January 11, 2008, July 21, 2008, October 2, 2009, March 5, 2010, September 10, 2010 and June 22, 2012. Emerald responded to all those requests for information in a timely manner.
43. EPA conducted a sampling event at the Emerald facility on May 5-6, 2011.
44. EPA contemporaneously provided Emerald with split samples from EPA's sampling event.
45. EPA's and Emerald's labs reported different concentrations of various HAPs from the split samples.

46. EPA and Emerald had several telephone conferences to discuss the sampling results and Emerald's reported flow rates for the Wastewater Treatment Plant.
47. Emerald's attorney submitted to the United States, on November 2, 2011, Emerald's determination that it receives less than 1 megagram of HAPs per year from PolyOne, a facility located adjacent to Emerald. In 2013, PolyOne was purchased by Mexichem, who continued to operate that facility.
48. Because Emerald receives less than 1 megagram of HAPs per year from Mexichem, it is subject only to Subpart A and 40 CFR §63.680 and 40 CFR §63.681 of Subpart DD.
49. EPA issued a Finding of Violation and Notice of Violation (FOV/NOV) to Emerald on November 20, 2012, alleging that Emerald had provided information in response to an information request from EPA which indicated that Emerald had discharged more than 8 lbs per hour of toluene, an organic material, from its wastewater treatment system.
50. In response to the FOV/NOV, EPA and Emerald had a Section 113 conference on January 31, 2013. Both during and following this conference, Emerald provided EPA with information and documentation of actions taken by Emerald to evaluate the issue identified in the FOV/NOV.
51. On April 11, 2013, Emerald submitted the results of Water 9 modeling for the wastewater treatment system and updated its toluene inventory tracking system confirming that the wastewater treatment system does not discharge more than 8 lbs per hour of toluene. Emerald has represented that this information is consistent with historical data.

Compliance Program

52. Emerald shall sample the incoming wastewater stream from Mexichem under normal operations starting within 6 months of signature of this Order. When conducting that

- sampling, it will follow the attached protocol (Attachment A) which notes sampling shall occur each quarter, for a total of four sampling events in a 12-month period.
53. Emerald will provide the final analytical results of each sampling event, referred to in Paragraph 52 above, to EPA within 30 days of the receipt of the final analytical results from the laboratory.
54. The month of the first sampling event will be the first month of the quarter. Emerald will provide those calculations referred to in Attachment A to EPA within forty five (45) days after the end of the each quarter for the next four (4) quarters for a total of four sampling events in a twelve (12)-month period.
55. Emerald will perform a monthly mass balance (12-month rolling average) of volatile organic materials (VOMs) to the wastewater treatment system of primary organic materials, as specified in Section 7.8.9 of its Title V permit. This monthly mass balance must include the VOM in the incoming wastewater streams from Mexichem.
56. Emerald will determine the VOMs from the Mexichem wastewater stream for the monthly mass balance by using the measured daily volume and the analytical results from weekly or monthly sampling of Mexichem's waste stream. For the second and all subsequent months, the results of the monthly analytical testing will be combined with previous month's results and an average concentration developed for subsequent use in the mass balance calculations with each current month's measured volume of the Mexichem wastewater stream. The weekly or monthly sampling will continue until Emerald determines that sample results are consistently representative of the Mexichem wastewater stream and then subsequently the average concentration from samples to date will be used with the measured volume each month for determining the monthly mass

balance. After Emerald determines that the sample results are consistently representative of the Mexichem wastewater stream:

- a) if any analytical results are not consistent with the previously determined average, or
- b) if Mexichem notifies Emerald of changes to process methods, volumes, or materials, that in Emerald's opinion would change the characteristics of the monthly VOM concentration,

then Emerald will resume weekly or monthly sampling of the wastewater stream , and will recalculate the average concentration using only post-change concentration data.

- 57. Beginning with the first full quarter after the Effective Date of this document, Emerald will provide those calculations referred to in Paragraph 55, to EPA within forty five (45) days of the completion of each quarter for the next eight quarters.
- 58. If, at any point, Emerald becomes aware that the characteristics of the waste stream from Mexichem has changed (through routine sampling, special sampling, notices from Mexichem, or otherwise) or if the total annual HAP quantity from Mexichem's incoming waste stream, as calculated in accord with Attachment A meets or exceeds 1 Megagram per year, Emerald will submit the following:
 - a. A new determination to EPA as required in Subpart DD at 40 CFR §63.680 and Attachment A; and,
 - b. Notify EPA within 30 days of the occurrence.
- 59. Emerald must comply with Subpart DD, at 40 CFR §§63.682 through 63.699, if the total annual HAP quantity received from Mexichem exceeds 1 megagram. If such a documented increase occurs over a twelve (12) month period, Emerald must submit a schedule for coming into compliance with the Subpart DD within 90 days of providing the notice set forth in paragraph 58.

60. Emerald must submit a revision to its Title V permit application to IL EPA incorporating the requirements in Paragraphs 53, 55, 56, 57, 58, 59 and the testing protocol in Attachment A within 90 days of the Effective Date of the Order. Emerald must submit a revision to its permit application referred to in Paragraph 60, to EPA within 90 days of the Effective Date of this Order.

61. Emerald must send all reports and other submittals required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

General Provisions

62. Emerald neither admits nor denies the factual allegations and findings in this Order or the FOV or FOV/NOV, but Emerald agrees to the terms of this Order and waives any right to contest or appeal the issuance of this Order.

63. This Order does not affect Emerald's responsibility to comply with other federal, state and local laws.

64. This Order does not restrict EPA's authority to enforce Section 112 of the CAA or any other section of the CAA.

65. Nothing in this Order limits the EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for Emerald's violation of Section 112 of the CAA and the NESHAPs at 40 C.F.R. Part 63, Subpart DD and Emerald's violation of the Illinois SIP and its Title V permit.

66. Failure to comply with this Order may subject Emerald to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.
67. The terms of this Order are binding on Emerald, its assignees and successors. Emerald must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.
68. Emerald may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Emerald fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. “Emission data” is defined at 40 C.F.R. § 2.301.
69. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation.
70. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.
71. This Order is effective on the date of signature by the Director of the Air and Radiation Division (“Effective Date”). This Order will terminate two years from the Effective Date, provided that Emerald has complied with all terms of the Order throughout its duration.

Administrative Consent Order

In the Matter of Emerald Performance Materials, LLC, Henry, Illinois

EPA-5-13-113(a)-IL-06

3/24/2014
Date

Timothy J. Wessel
Timothy J. Wessel
President
Emerald Polymer Additives

3/30/14
Date

George T. Czerniak
George T. Czerniak
Director
Air and Radiation Division

Attachment A

OVERVIEW

Execution of this plan is intended to provide the information necessary to confirm the applicability of the facility-wide exemption specified in 40 CFR § 63.680, and will accurately represent the batch process present at the adjacent PolyOne/Mexichem facility whose wastewater containing vinyl chloride is treated in the Emerald Performance Materials' ("Emerald") Henry, Illinois facility.

SAMPLING AND ANALYSIS PLAN

Sampling involves the following:

- Collecting a set of five wastewater samples of the discharge from the Centrate Tank and collecting a set of five wastewater samples of the discharge (at the suction side) of the Lift Station. Sufficient sample material will be collected in order to determine the concentration of volatile organic compounds (VOCs) as well as semi-volatile organic compounds (SVOCs). See Figure 1 for sample locations.
 - A suggested schedule would be:
 - Monday morning – one sample at each location
 - Monday afternoon – one sample at each location
 - Tuesday morning – one sample at each location
 - Tuesday afternoon – one sample at each location
 - Wednesday morning – one sample at each location
- This schedule would be repeated each quarter, for a total of four sampling events in a 12-month period. Sampling on multiple days, as well as at four different times per year will be sufficient to represent both the batch nature of the PolyOne/Mexichem processes and seasonal variations.
- Each sampling event shall be scheduled during periods of "normal" operations. For example, a sampling event would not be scheduled during times when the PolyOne/Mexichem facility is shutdown or when the facility is experiencing an upset condition.
- Grab samples will be collected in a manner such that volatilization of organics contained in the sample is minimized and managed (preservation, shipping, etc.) as required by the applicable USEPA analytical method and analyzed by the laboratory within the timeframes specified in the applicable analytical method.

The collection of five samples at each location per event will provide a meaningful average concentration, and will account for a range of operational concentrations and flows.

Analysis of all samples will involve using USEPA analytical methods. Method 624 in 40 CFR part 136, appendix A is used to measure purgeable organic compounds using GC/MS. Method

625 in 40 CFR part 136, appendix A is used to measure a number of organic compounds that are partitioned into an organic solvent and are analyzed using GC/MS.

Both Method 624 and Method 625 are commonly used for analysis of wastewaters. These two methods would be appropriate for sampling of the PolyOne/Mexichem wastewaters because they will detect concentrations of the expected hazardous air pollutant (HAP) constituents.

A laboratory will be selected that has the capability, experience, and necessary certifications to provide the analyses.

FLOW MONITORING

An average flow will be determined for each sampling location for the days that sampling occurs.

Flow monitoring data will be generated using Emerald's Aspen system. Each of the flows of interest, the Lift Station (FI-4007/OUT) and the Centrate Tank (213 Process Flow, FI-1822/OUT) are metered. The output from both meters is wired to the Bailey system; the Bailey system passes the data from the meters to the Delta V system which passes the data to the Aspen system. The Aspen system examines the values at 10-second intervals and stores a value. For each interval, if the flow amount varies from the previously stored value by more than a set value, the new value is stored. The Aspen system will store at least one data point per hour.

CALCULATIONS

The analytical results of the five samples from each location will be averaged together, providing a "composite" type sample result. An average daily flow amount will be determined for each multi-day sampling event.

The analytical results from the four sampling events will be averaged and the results of the flow measurements will be averaged. The averaged flow will be applied to the average concentration to determine a mass-weighted average concentration for the year.

This value will be considered the total annual quantity of the vinyl chloride that is contained in the off-site material received at the plant site and will be reviewed to determine if it is less than 1 megagram per year.

CERTIFICATE OF MAILING

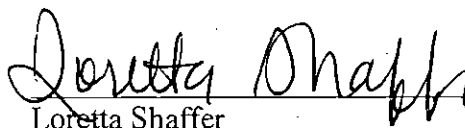
I, Loretta Shaffer, certify that I sent an Administrative Consent Order, No. EPA-5-14-113(a)-IL-06, by Certified Mail, Return Receipt Requested, to:

Timothy J. Wessel
President
Emerald Polymer Additives
1550 County Road 1450 N
Henry, IL 61537

I also certify that I sent copies of the Administrative Consent Order by first-class mail to:

Eric Jones
Manager, Compliance Unit
Bureau of Air
Illinois Environmental Protection Agency
1000 Converse Ave
Floor 4
Springfield, IL 62794

On the 31 day of March 2014



Loretta Shaffer
APA
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7670 0672